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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO
2019 AUG 22 PM 12: 01

IN RE:

The Financial Oversight and Management Board for Puerto Rico,

As representative of

The Commonwealth of Puerto Rico, et al.,

**Debtors** 

PROMESA Title III KY'S OFFICE U.S. DISTRICT COURT

No. 17 BK 3283 ALTSJAN, P.R.

(Jointly Administered)

This Filing Relates to HTA.

REPLY TO SIXTY – SEVENTH ONMIBUS OBJECTION (NON-SUBSTANTIVE) OF THE PUERTO RICO HIGHWAYS AND TRASNPORTATION AUTHORITY TO DUPLICATE AND DEFECIENT CLAIMS (Docket Entry No. 8302)

## TO THE HONORABLE COURT:

COMES NOW, Aracelia Torres Irizarry, a/k/a Aracelia Torres, the creditor for the above referenced case and very respectfully states as follows:

- 1. I have recently received the Sixty-Seventh Omnibus Objection (Non-Substantive) of the Puerto Rico Highways and Transportation Authority to Duplicate and Deficient Claims where I am informed that the proof of claim no. 10894 is subject to this objection.
- 2. That on August 9th, 2019 I emailed Prime Clerk in order to request assistance in the correction of the objected claim since I filed the claim on my own and by involuntary error, I identified the wrong case and also made an error in the amount of my claim. I attached to that email various documents including which includes an amended proof of claim and evidence to sustain my claim. (See evidence attached to this motion).
- 3. As informed in my email, I am an elder and was very confused by the forms that needed to be completed in order to save my money.

- 4. I respectfully inform that I will be filing an Amended Proof of Claim No. 10894 with the proper exhibits to sustain my claim.
- 5. I believe that the amended proof of claim will resolve all the issues raised by The Puerto Rico Highways and Transportation Authority by and through the Financial Oversight and management Board for Puerto Rico.

WHEREFORE, I respectfully request to this Honorable Court to take notice of the preceding facts and disallow the objection raised on Proof of Claim No. 10894 filed by creditor Aracelia Torres.

## RESPECTFULLY SUBMITTED.

In Caguas, Puerto Rico, this 21st day of August 2019.

**NOTICE:** Within **fourteen (14) days** after service as evidenced by the certification, and an additional **three (3) days** pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that on this same date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System which will send a notification to all system's participants including the U.S. Trustee's Office and the Appointed Trustee. I also certify that I am sending a true copy of this motion to Hermann D. Bauer, Esq to the following mailing address: Oneill & Borges LLC 250 Muñoz Rivera Ave. Suite 800 San Juan PR 00918-1813 and to Martin J. Bienenstock and Brian S. Rosen. to the following mailing address: PROSKAUER ROSE LLP Eleven Times Square, New York, NY 10036.

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Aracelia Torres Irizarry

Creditor

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